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December 9, 2014

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: Wireless E9-1-1 Location Accuracy Requirements, PS Docket No. 07-114

Dear Ms. Dortch:

On behalf of the New York State Chapter of NENA, the 9-1-1 Association, and our more than 160 members from across the Empire State, I write to express our strong support for the location accuracy agreement recently concluded between NENA, APCO, and the 4 national wireless carriers.

Today's latitude/longitude based Wireless E9-1-1 systems are critically important to the efficiency and effectiveness of public safety services. These systems must be improved, and we commend the parties to the Agreement for including specific, measurable targets for "x-y" improvements at the 50m level proposed by the Commission. The technology improvements required to meet those targets will be substantial, and the results will be a significant improvement in outdoor accuracy and both indoor accuracy and yield.

More importantly, however, we wholeheartedly endorse the deployment of "Dispatchable Location" technology for wireless 9-1-1 calls contemplated by the agreement. Since the Enhanced 9-1-1 service was originally deployed, Automatic Location Identification for wireline calls has made available the caller's physical address to 9-1-1 centers. This allows reliable, immediate dispatch of appropriate field responders, and provides key route insight for responding units. That same level of service, however, has never before been available to wireless 9-1-1 callers. Enabling Dispatchable Location delivery will provide a wireline-like level-of-service for wireless callers, saving lives and preserving property.

Both of these improvements are critical for consumers and public safety professionals in New York. Latitude/longitude improvements will speed responses to emergencies on our heavily-used lakes and rivers, and Dispatchable Location improvements will provide faster and better responses for residents at hundreds of dormitories, apartment complexes, and office buildings throughout our state. Because our chapter supports these and other critical improvements required by the Roadmap Agreement, we urge the Commission to quickly codify its relevant provisions, and to support its ongoing implementation whenever possible.

Sincerely,

K. Michael Hanna

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K. MICHAEL HANNA
STEUBEN COUNTY LEGISLATOR
DISTRICT 5